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12 IN THE UNITED STATES DISTRICT COURT  
13 EASTERN DISTRICT OF CALIFORNIA  
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16 UNITED STATES OF AMERICA,

Case No. 1:23-MC-00086-NODJ

17 Plaintiff,

18 v.

19 2018 MASERATI GRAN TURISMO,  
LICENCE NUMBER 8EOX182, VIN:  
ZAM45VLA3J0253945<sup>1</sup>,  
STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

20 APPROXIMATELY \$68,119.88 SEIZED  
FROM E\*TRADE ACCOUNT NUMBER  
5147-0717, HELD IN THE NAME OF  
VIKEN YEPREMIAN, and

21 APPROXIMATELY \$71,207.76 SEIZED  
FROM GOLDMAN SACHS, MARCUS  
ONLINE SAVINGS ACCOUNT NUMBER  
300007772619, HELD IN THE NAME OF  
VIKEN YEPREMIAN,

22 Defendants.  
23

24 It is hereby stipulated by and between the United States of America, potential claimants Viken  
25 Yepremian and Sonia Yepremian (“Viken” and “Sonia”), by and through their respective counsel, and  
26 potential claimant and Mardig Yepremian (“Mardig”), appearing *in propria persona* (collectively  
27 “claimants”) as follows:

28 <sup>1</sup> This asset was returned to Viken and Mardig Yepremian in exchange for \$50,250.00 and is the substitutes *res.*

1       1. On or about June 6, 2023, claimants Viken and Sonia filed claims in the administrative  
2 forfeiture proceeding with the Federal Bureau of Investigation (“FBI”) with respect to the Approximately  
3 \$71,207.76 seized from Goldman Sachs, Marcus Online Savings account number 300007772619, held in  
4 the name of Viken Yeremian and Approximately \$68,119.88 seized from E\*Trade account number  
5 5147-0717, held in the name of Viken Yeremian which were seized on March 10, 2023. Claims were  
6 filed by Viken and Mardig on or about June 6, 2023, in the administrative forfeiture proceeding with the  
7 FBI with respect to the 2018 Maserati Gran Turismo, License Number 8EOX182, VIN:  
8 ZAM45VLA3J0253945, which was seized on March 16, 2023 (hereafter collectively the “defendant  
9 assets”).

10      2. The FBI has sent the written notice of intent to forfeit required by 18 U.S.C. §  
11 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
12 defendant assets under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimants have filed a  
13 claim to the defendant assets as required by law in the administrative forfeiture proceeding.

14      3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
15 forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets are  
16 subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
17 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
18 That deadline was September 4, 2023.

19      4. By Stipulation and Order filed August 30, 2023, the parties stipulated to extend to  
20 November 30, 2023, the time in which the United States is required to file a civil complaint for forfeiture  
21 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
22 to forfeiture.

23      5. By Stipulation and Order filed November 8, 2023, the parties stipulated to extend to  
24 February 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture  
25 against the defendant assets and/or to obtain an indictment alleging that the defendant assets are subject  
26 to forfeiture.

27      6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to May  
28 28, 2024, the time in which the United States is required to file a civil complaint for forfeiture against the

1 defendant assets and/or to obtain an indictment alleging that the defendant assets are subject to forfeiture.

2       7. Accordingly, the parties agree that the deadline by which the United States shall be required  
3 to file a complaint for forfeiture against the defendant assets and/or to obtain an indictment alleging that  
4 the defendant assets are subject to forfeiture shall be extended to May 28, 2024.

5 Dated: February 22, 2024

PHILLIP A. TALBERT  
United States Attorney

7 By: /s/ Kevin C. Khasigian  
8 KEVIN C. KHASIGIAN  
9 Assistant United States Attorney

10 Dated: February 22, 2024

/s/ Alaleh Kamran  
11 ALALEH KAMRAN  
12 Attorney for potential claimants  
Viken Yepremian and Sonia Yepremian  
(Signature authorized by email on 2/22/24)

14 Dated: February 21, 2024

/s/ Mardig Yepremian  
15 MARDIG YEPREMIAN  
16 Potential Claimant  
17 Appearing *in propria persona*  
9544 N. Larkspur Avenue  
Fresno, CA 93720  
(Original signature retained by attorney)

19 **ORDER**

21       **IT IS SO ORDERED.** the deadline by which the United States shall be required to file a complaint  
22 for forfeiture against the defendant assets and/or to obtain an indictment alleging that the defendant assets  
23 are subject to forfeiture IS extended to May 28, 2024.

24 DATED: February 27, 2024.

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26 CHIEF UNITED STATES DISTRICT JUDGE